

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 13-10200-GAO
	)	
DZHOKHAR TSARNAEV	)	

**STATUS REPORT AND JOINT MOTION FOR EXTENSION OF DEADLINE  
RE: JOINT LISTING OF DOCKET ENTRIES THAT SHOULD  
BE UNSEALED AND SUPPORTING BASIS FOR CONTINUED SEALING**

The defendant, Dzhokhar Tsarnaev, and the United States, by and through counsel, respectfully submit this status report regarding efforts to comply with the Court's Scheduling Order regarding docket entries currently under seal, *see* D.E. 1605, as well as a request to extend the deadline regarding disputed docket entries.

On January 25, 2016, the parties submitted a 22-page list of approximately 621 documents both parties agreed should be unsealed. [DE 1626]. At the parties' request, the Court has twice granted additional time, most recently to February 29, 2016, for the parties to review and discuss the remaining documents. [DE 1623, 1638]. During the past several weeks, the parties have regularly conferred and exchanged positions regarding the remaining pleadings and exhibits that were the subject of sealing motions. The parties have identified additional pleadings and exhibits that can be unsealed in their entirety or with minor redactions and will submit that list by the close of business this day.

In the course of discussing and, where necessary, redacting the sealed entries, the parties have developed and traded rationales for their respective positions regarding the remaining docket entries. What remains outstanding, however, is the task of producing “a chart setting forth each disputed docket entry by docket number and document title, the supporting party’s basis for continuing the seal, and the opposing party’s response.” D.E. 1605. The parties request a brief additional period of time to accomplish this task.

The parties therefore jointly request the following:

1. The parties provide a second joint list of Docket Entries that can be unsealed in full or redacted form, along with the proposed redacted versions themselves, to the Clerk’s Office by the close of business this day, Monday, February 29, 2016;
2. The Court extend the deadline for submitting the chart setting forth disputed docket entries to March 14, 2016.

Respectfully submitted,

CARMEN M. ORTIZ  
United States Attorney

By: /s/ Alope S. Chakravarty  
William D. Weinreb  
Alope S. Chakravarty  
Nadine Pellegini  
Assistant U.S. Attorneys

DZHOKHAR TSARNAEV  
by his attorneys

/s/ Timothy Watkins  
Judy Clarke, Esq. (CA Bar # 76071)  
CLARKE & RICE, APC  
1010 Second Avenue, Suite 1800  
San Diego, CA 92101  
(619) 308-8484  
JUDYCLARKE@JCSRLAW.NET

David I. Bruck, Esq.  
220 Sydney Lewis Hall  
Lexington, VA 24450  
(540) 460-8188  
BRUCKD@WLU.EDU

Miriam Conrad, Esq. (BBO # 550223)  
Timothy Watkins, Esq. (BBO # 567992)  
William Fick, Esq. (BBO # 650562)  
FEDERAL PUBLIC DEFENDER OFFICE  
51 Sleeper Street, 5th Floor  
(617) 223-8061  
MIRIAM\_CONRAD@FD.ORG  
TIMOTHY\_WATKINS@FD.ORG  
WILLIAM\_FICK@FD.ORG

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on February 29, 2016.

/s/ Timothy G. Watkins